

1 WILLIAM J. SIMMONS, ESQ., Pennsylvania, Bar No. 206860
2 *Admitted Pro Hac Vice*
3 LITTLER MENDELSON, P.C.
4 1601 Cherry Street, Suite 1400
5 Philadelphia, PA 19102-1321
6 Telephone: 267.402.3000
7 Fax No.: 267.402.3131
8 Email: wsimmons@littler.com

9 DIANA G. DICKINSON, ESQ., Bar No. 13477
10 LITTLER MENDELSON, P.C.
11 3960 Howard Hughes Parkway
12 Suite 300
13 Las Vegas, NV 89169-5937
14 Telephone: 702.862.8800
15 Fax No.: 702.862.8811
16 Email: ddickinson@littler.com

17 Attorneys for Defendant
18 BACKGROUNDCHECKS.COM LLC

19
20
21
22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Jose A. Iraheta Hernandez,
Plaintiff/s,

vs.

Backgroundchecks.com, LLC,
Defendant/s.

Case No. 2:20-cv-01766-GMN-BNW

**STIPULATION FOR AN EXTENSION OF
TIME FOR DEFENDANT TO FILE A
REPLY IN SUPPORT OF ITS MOTION
TO STAY DISCOVERY
(FIRST REQUEST)**

JOSE A. IRAHETA HERNANDEZ (“Plaintiff”) and BACKGROUNDCHECKS.COM LLC (“Defendant”), by and through their undersigned counsel, hereby agree and stipulate to extend the time for Defendant to file its reply in support of its Motion to Stay Discovery filed on January 22, 2021 (ECF No. 26) from the current deadline of February 12, 2021, up to and including **February 26, 2021**.

This is the first request for an extension of this deadline. The extension is requested to accommodate the workload and schedule of defense counsel, is sought in good faith, and is not made for the purposes of delay.

1 The parties agree that good cause exists for this extension.

2 Dated: February 9, 2021

Dated: February 9, 2021

3 Respectfully submitted,

Respectfully submitted,

4
5 /s/ Michael Kind

6 MICHAEL KIND, ESQ.
KIND LAW

/s/ Diana G. Dickinson

WILLIAM J. SIMMONS, ESQ.
DIANA G. DICKINSON, ESQ.
LITTLER MENDELSON, P.C.

7 GEORGE HAINES, ESQ.
8 GERARDO AVALOS, ESQ.
FREEDOM LAW FIRM, LLC

Attorneys for Defendant
BACKGROUNDCHECKS.COM LLC

9 Attorneys for Plaintiff
10 JOSE A. IRAHETA HERNANDEZ

11
12 **IT IS SO ORDERED.**

13 Dated: February 16, 2021.

14
15 

16 UNITED STATES MAGISTRATE JUDGE

17 4821-3936-7387.1 103757.1007
18
19
20
21
22
23
24
25
26
27
28